



mwe.com

Kristin Going  
Attorney at Law  
kgoing@mwe.com  
+1 212 547 5429

March 9, 2020

**VIA ECF AND OVERNIGHT DELIVERY**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: *In re Motors Liquidation Company* – Case No. 09-50026(MG)**

Dear Judge Glenn:

Pursuant to (i) the *Scheduling Order for Briefing Late Claims Motions* (ECF No. 14661), (ii) the *Memorandum Endorsed So Ordered Letter* signed on 2/18/2020 (ECF No. 14670) and (iii) the *Memorandum Endorsed So Ordered Letter* signed on 3/3/2020 (ECF No. 14679), Designated Bankruptcy Counsel for the Economic Loss Plaintiffs and the Motors Liquidation Company GUC Trust submit this joint letter seeking extension of the deadline for submitting a proposed briefing schedule for any and all matters relating to (i) late claims sought to be filed by the Economic Loss Plaintiffs and (ii) the supplemental briefing request made by the Peller Plaintiffs in their October 27, 2019 letter to the Court. The current deadline for the above briefing schedule proposals is Monday, March 9, 2020. The parties respectfully request that the Court reset these deadlines to Monday, March 16, 2020. The parties believe this additional time will allow them to make progress on their discussions and potentially narrow or resolve disputes with respect to proposed next steps. This is the parties' third extension request. Granting this extension would not affect any other deadlines.

We appreciate the Court's attention to this request, and we are available if the Court has questions or needs additional information.

Respectfully submitted,

*s/ Kristin Going*

Kristin Going

cc: Edward S. Weisfelner, Esq. (via e-mail and ECF)  
Gary Peller, Esq. (via e-mail and ECF)  
Eric B. Fisher, Esq. (via e-mail and ECF)  
Paul M. Basta, Esq. (via e-mail and ECF)  
Arthur Steinberg, Esq. (via e-mail and ECF)